| 1  | PROCEEDINGS  |
|----|--|
| 2  | (Transcript follows in sequence from Volume 14.)               |
| 3  | DON WOOD   |
| 4  | having been called as a witness on behalf of MCI and AT&T, and |
| 5  | being duly sworn, continues his testimony as follows:          |
| 6  | CONTINUED CROSS EXAMINATION                                    |
| 7  | BY MR. FUHR:   |
| 8  | Q The image of a model with 1 million cells is sort            |
| 9  | of a daunting constant when you think of 300 or 400 different  |
| 10 | input values. But some of these cells are not simply a number, |
| 11 | but rather a formula; correct?                                 |
| 12 | A That's right.  |
| 13 | Q And would you - strike that. Is it your                      |
| 14 | understanding that there are more than 5,000 cells in this     |
| 15 | model that consist of some form of mathematical formula that   |
| 16 | defines that cell?   |
| 17 | A Yeah. I think - I don't know the exact number. I             |
| 18 | think it is between five and 6,000. There are a lot of them.   |
| 19 | Q And has AT&T or Hatfield & Associates disclosed              |
| 20 | and made publicly available all those 5,000 models or 5,000    |
| 21 | formulas?  |
| 22 | A To my knowledge they have. Again, if you know,               |
| 23 | those may be situations where there is that's you may not      |
| 24 | have the option as a reviewer of the model to change those     |
| 25 | calculations. You have the option to see them.                 |

| 1  | Q Are you able to quantify what the rest of the data            |
|----|---|
| 2  | is, or when you say "most of the data is data that cannot be    |
| 3  | changed," are you able to put an order of magnitude on that?    |
| 4  | A Well it's we're talking about 400 user                        |
| 5  | definables, which are the ones that should be user definable.   |
| 6  | Those are the key assumptions to the model. They determine      |
| 7  | whether it's right or wrong. Some of those change state by      |
| 8  | state. Some don't.  |
| 9  | To the extent that there are a million more cells               |
| 10 | out there, five or 6,000 which are calculations, really         |
| 11 | everything that's left over.                                    |
| 12 | Q It's a mathematical difference of those numbers?              |
| 13 | A I'm sorry? It's a very big number. It's hundreds              |
| 14 | of thousands.   |
| 15 | Q Who made the judgment as to which of the inputs               |
| 16 | were ones that could be adjusted by the user and which ones     |
| 17 | would be hard wired or in some manner made nonadjustable by the |
| 18 | user?   |
| 19 | A I don't know what individual would have made that             |
| 20 | decision. I have talked it over certainly with Dr. Mercer, and  |
| 21 | it's my understanding the decision was made just on the type of |
| 22 | logic that I've described to you.                               |
| 23 | There is a lot of raw data here that's census data,             |
| 24 | USGS data that shouldn't be changed by anyone reviewing the     |

25 model. That's not the data that's at dispute here.

- 1 is going to matter. Cost of capital is going to matter. The
- 2 variable overhead factor is going to matter; taxes, let's see,
- 3 network operations, NID, feeder fill, distribution fill,
- 4 distribution structure, distribution installation, copper
- 5 feeder structure, copper feeder installation, fiber feeder
- 6 structure, fiber feeder installation, drop NID internal
- 7 investment assumptions, structure factor shares related to
- 8 telephone, serving area interface investment, digital loop
- 9 carrier investment, and I believe that's all.
- 10 Now I -- what I -- let me be clear. What I'm
- 11 giving you here are the categories as I've written them down as
- 12 a guide to the document. There may be within each of those
- 13 categories I gave you a number of different specific inputs
- 14 that makes that list much longer. But that's the overview.
- 15 Q With respect to those inputs, how many of those
- 16 values have been drawn specifically from the Florida GTE
- 17 market?
- 18 A I -- well we will have to go back through.
- 19 Q Let me approach it this way. Can you identify any
- 20 of those inputs that contain values that were derived
- 21 specifically from the GTE Florida market?
- 22 A No. As I described to you before, these are --
- 23 national defaults were used unless there was a reason to change
- 24 them. And there weren't any reasons that were identified. Now
- 25 the loop costs are in fact Florida GTE specific for a number of

- 1 the -- how much is material and how much is labor, labor is
- 2 certainly a significant cost of -- a pole, for example. It
- 3 costs at least as much to put a pole in place as it costs you
- 4 to buy the pole in the first place.
- 5 But then when we start aggregating these costs
- 6 together and look at that total loop cost number, labor is a
- 7 much, much smaller component of that cost.
- 8 Q And the model assumes that the labor component cost
- 9 is the same in every state; correct? It just uses a national
- 10 number?
- 11 A It uses the national numbers which could be varied
- 12 if there were an instance where there were a reason to show
- 13 that labor costs in a certain region of the country were higher
- 14 than the national average.
- 15 Q And the same is true with respect to the material
- 16 or structural component; correct?
- 17 A That's right. The materials are -- I think the
- 18 material assumption is quite defensible, because most
- 19 companies, including GTE, have national purchasing operations.
- 20 You're going to buy lots of poles, and you're going to use the
- 21 fact that you're a national company to give yourself some
- 22 buying power when you do that.
- 23 Q All right. One of the other variables I think you
- 24 said was an important one was depreciation?
- 25 A That's important, yes.

- 1 not an opening of a trench and a closing of a trench. It's -
- 2 I don't know what the engineering term would be -- sticking it
- 3 down there directly comes to mind, but it's not necessarily a
- 4 trenching process. And I think this is actually much cheaper
- 5 than opening and closing a trench.
- 6 Q But the Hatfield documentation assumes that there is
- 7 going to be trenching costs of \$45 per foot; is that correct?
- 8 A That's right. And to the extent that there is a
- 9 cheaper way to do it, there is some overstatement of costs
- 10 here.
- 11 Q Now by using a structure factor .33 then, there's only
- 12 \$15 per foot for trenching attributed to telephone service; is
- 13 that correct?
- 14 A If I understand your question correctly, you're right.
- 15 Actually no one has asked it quite that way before. Let me
- 16 think about that for a minute. Yes, the answer is yes.
- 17 Q But the LEC presumably spent \$45 per foot for
- trenching, so who's paying the other \$30?
- 19 A Well, actually, the middle assumption is the one that
- 20 may not be right and, that is, when you look at areas that are
- 21 being developed And I happen to be living in the middle of a
- 22 construction zone, so I'm seeing some of this stuff. You're
- 23 seeing trenches opened and three or four utilities actually
- 24 coming out and using that. And it's probably not even any of
- 25 the one of the three utilities that's digging the trench. What

- 1 I've seen are subcontractors digging a trench, utilities making
- 2 use of it jointly, they're coordinating their efforts as they
- 3 put their facilities in place to save money. And as the
- 4 incentive to save money increases, I think we'll see these guys
- 5 getting together more.
- 6 So, the answer to who else pays for it is whoever else
- 7 is putting facilities in that trench and at least in this case
- 8 it was cable and power.
- 9 Q So in your opinion would it be normal procedure for a
- 10 LEC to seek out other service providers to share the costs of
- 11 trenching before they install the buried cable?
- 12 A If it hasn't been standard procedure in the past in a
- 13 rate of return environment, and I can see where maybe it
- wouldn't be, going forward, if they're right in what they tell
- 15 us about the new incentives of competition and the new
- incentives of a price cap arrangement, then I think we have
- 17 every reason to expect it to become standard procedure. I
- 18 think they're going to find -- They're some very qualified
- 19 people running these companies; they'll find ways to save money
- and this one appears to be a pretty obvious one that they can
- 21 make use of.
- 22 Q Do you know what percent of GTE Florida's conduits are
- 23 shared by other kinds of providers?
- 24 A No, I don't.
- 25 Q Do you know what percent of GTE Florida's telephone

- 1 poles are shared by other kinds of providers?
- 2 A No. And, again, we don't want to look at what's in
- 3 place today. We want to look at on a going-forward basis what
- 4 the number would be and what the sharing would be and if they
- 5 have got more incentive to share in the future, we're going to
- 6 see more of it, but certainly there is some today.
- 7 Q Mr. Wood, would you accept, subject to check, that
- 8 using the .33 factors reduced the total loop costs computed by
- 9 the Hatfield Model for GTE Florida by almost \$4 a month, \$3.90
- 10 to be exact?
- 11 A Again, I haven't run that analysis, but if Staff has
- 12 run it, I'll accept your figures. Again, I guess I'm glad to
- 13 see that Staff has made use of the model to run the sensitivity
- 14 analysis.
- 15 Q When a telephone company installs copper cable, is the
- 16 kind of cable that could be suspended on telephone poles
- 17 identical to the kind of cable that could be buried in the
- 18 ground?
- 19 A No, it will be a little bit different. Often the
- 20 suspended cable will have additional facilities that will
- 21 control the stretch. If you have ever looked at lines on a
- 22 pole in the summer, they sag quite a bit more than they do in
- 23 the winter. And, similarly, if you're going to bury cable
- 24 directly and not put it into a conduit, you're going to make
- 25 sure that there is a sheath that will protect from water entry.

- 1 So there is going to be some difference. There's not always a
- 2 big cost difference. It's a much bigger driver to go to, from
- 3 a, say a 20-pair cable to 3600-pair cable. That makes much
- 4 more difference than some of these other characteristics, but
- 5 there will be some different ones.
- 6 Q is the price of cable that could be suspended on poles
- 7 identical to the price of cable that could be buried in the
- 8 ground?
- 9 A No, again, it won't be identical. It will be
- 10 different but it won't necessarily -- That won't necessarily be
- 11 the factor that drives the difference.
- 12 Q So does the Hatfield Model assume that the materials
- 13 price of aerial cable differs from that of underground cable?
- 14 A Well, it's got a different set of assumptions. And
- 15 let me get on the right page. The costs that you see there are
- 16 not always different, but they're changeable to reflect the
- 17 possibility.
- 18 Q | believe that's C-1.
- 19 A It's on C-1. I was actually also looking at the
- 20 document that has the column that describes the sources. But,
- 21 at any rate, you're going to see Where you see, you're going
- 22 to see two different columns here for Hatfield inputs, so that
- 23 it's clear that for different types of cables that will be used
- 24 in different ways like that, that the model will accommodate
- 25 differences in costs. To the extent that a significant

## APPENDIX D

### BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF HAWAII

In the Matter of

AT&T COMMUNICATIONS COMPANY OF HAWAII,
INC.

| PAGES 477-670 |
| (IN-CAMERA |
| PAGES 489-498,
| Petition filed August 19, 1996 for arbitration with GTE Hawaiian Telephone Company Incorporated.

| Company Incorporated |
| Compan

### TRANSCRIPT OF PROCEEDINGS

Held on October 17, 1996, commencing at 8:30 AM, at 465 South King Street, #103, Honolulu, Hawaii, pursuant to Notice.

#### **BEFORE:**

YUKIO NAITO DENNIS YAMADA GREGORY PAI Chairman of the Commission Commissioner Commissioner

#### APPEARANCES:

MICHAEL H. LAU, ESQ. MICHAEL P. HURET, ESQ. For AT&T Communications of Hawaii, Inc.

JEFFREY A. MALIONADO, ESQ. J. BURKE McCORNICK, ESQ. ROD S. AOKI, ESQ. For GTE Hawaiian Telephone Company Incorporated

ALSO PRESENT:

BERTHA F. KURO! AWA

Chief Clerk (PUC)

REPORTED BY: Sheila S.L. Chong, State of Hawaii C.S.R. No. 112

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- firm. And we believe that it comports to what a
- telephone company do if it were building a network
- 3 today for the future.

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- Q. What real world data did you look at to externally verify the model?
- A. Well, the model contains numerous real world input. It has, as I mentioned earlier, literally hundreds of inputs. And these inputs are such things as cost of equipment, cost of installation, expense factors and so on.
  - Q. But did you ever run a test with it with any state-specific real world data to see what the results would be?
    - A. Not exactly, but let me try to do it this way I think it would be inappropriate to use state-specific, certain state-specific real world data. For example, as we all know, one of the significant cost drivers in the model is fill factors. If we were to use traditional telephone company fill factors in our model, one would, one would get higher prices. But I don't think it would be appropriate to use those factors in the kind of forward-looking economic cost model that we have built.
  - Q. So you haven't done any testing using
    Hawaii-specific data of any of the variables in the

- 1 A. Well, my quess is it's larger than Rhode
- 2 Island, but relative to many states, it's a smaller
- 3 geographical area.
- Q. But you'd agree there would not be a mountain
- within a mile or two of the ocean in Rhode Island,
- 6 wouldn't you?
- 7 A. Well, they have some people in New Hampshire
- 8 who believe that they have mountains there --
- 9 Q. But that's not Rhode Island, is it?
- 10 A. But it's very close. But I agree with you.
- 11 Q. Now, a telephone customer may not necessarily
- 12 be connected -- and I'm talking about one in Hawaii
- 13 specifically -- may not necessarily be connected to the
- 14 nearest central office as the crow flies. Isn't that
- 15 right?
- 16 A. Yes, and that's probably true generally.
- 17 Q. Okay. Because there may be topographical
- barriers that prevent running a loop from the
- 19 customer's premises to the central office. Isn't that
- 20 right?
- 21 A. That may be one reason.
- Q. But the Hatfield Model, isn't it correct,
- 23 assumes :hat a customer will be connected to the
- 24 closest central office, doesn't it?
- 25 A. Yes, that's an assumption made by the model.

- Q. Okay, and in that respect, the model does not
- 2 mirror a real world phenomenon.
- 3 A. That's right. Again, it is a model.
- 4 Q. What ratios have you assigned for GTE Hawaiian
- 5 Tel with respect to the amount of cable that's buried
- 6 underground versus aerial cable?
- 7 A. We use the default ratios in the model.
- 8 Q. What are the default ratios? Where did you
- 9 get the lefault ratios -- not what the actual numbers
- 10 are but where did you get them?
- 11 A. The engineers in the firm, Dick Chandler and
- 12 Bob Mercer, developed default measures based on talking
- to experts and their experience in the industry.
- 14 Q. Okay. -
- 15 A. And I think they also looked at ARMIS data on
- 16 either a.l LEC or RBOC basis.
- 17 Q. So they didn't actually look at zoning
- ordinances, for example, did they, that were say
- 19 Hawaii-specific?
- 20 A. No.
- Q. And you said they talked to experts. Would
- 22 that be John Donovan?
- 23 A. That's one expert, yes.
- 24 Q. Did Mr. Donovan make any studies or did ha
- 25 just bas: it on his experience with NYNEX?

- 1 A. Studies of what?
- Q. Studies of where aerial cable would be
- 3 required versus cable buried underground?
- 4 A. Yeah. I can't give you a precise answer. I
- 5 don't know. I mean --
- 6 Q. You're not aware of any studies.
- 7 A. I'm not aware of any studies.
- 8 Q. Is it true that the data for cost of capital
- 9 that's used by the model was an estimate furnished to
- 10 you by AT&T?
- 11 A. No.
- 12 Q. Where did you get the data for cost of
- 13 capital?
- 14 A. The cost of capital data were contained in a
- 15 study that MCI submitted in a docket at the FCC.
- 16 Q. So it came from MCI.
- 17 A. Correct.
- 18 Q. Do you know whether the cost estimates for
- 19 things like manhole prices that are in the model for
- 20 Hawaii are in line with GTE's actual cost?
- A. No, I don't.
- Q. How does the Hatfield Model arrive at its fill
- 23 factors?
- A. Those fill factors are based on the
- 25 engineering judgment of the engineers at Hatfield and

- are formulas. We have no set of equations to represent
- what's in those formulas; we don't have the code. It's
- 3 certainly true that as between this version, or this
- 4 release, and the earlier one, it is more
- 5 user-friendly. But there's a way in which it is not
- 6 user-friendly, when one is trying to do verification.
- 7 I've been doing some runs; we've engaged some people to
- 8 make some runs of the model for us; we're putting it
- 9 through the sensitivity testing that Dr. Kelley said is
- one of the things that has to be done.
- Now, we've been trying to do some of the
- 12 verification, and also some of what we would refer to
  - as validation -- and I'll explain what the difference
  - is. You run into some a anomalies; you don't know
  - 15 whether there's a bug in the code. This model has
  - 16 undergone a lot of changes recently -- some minor and
  - 17 some major. It is very likely there are still bugs in
  - 18 the code Are they important? Don't know. Do they
  - 19 explain some of the anomalies? Don't know at this
  - 20 point. How do you check that? Well, let me give you
  - 21 an example.
  - Now. I was involved in an exercise in which we
  - increased the 3 switch input prices that are used in
  - the model by 33 percent to see what would happen.
  - Okay? Switching costs went up by what appears to be an

appropriate amount. We only increased the price of the 1 purchase of the switch, and that's not all the cost in 2 the wire center. Okay? But for some reason, loop 3 costs went down. Can't imagine why. Okay? Did we do 5 something wrong? We tried it a couple of different 6 There is at least 2 different ways you can ways. enter inputs. We had different people run it on 7 different machines with different what are called "work 8 files," so that hopefully there was no contamination. 9 Okay? 10 We haven't resolved that thing yet. Now, how would 11 you do it? Well, one way to do it, if you had an 12 equation set, you'd check it. If you had the code, 13 14 you'd check it. - Absent that, what you have to do is go in and try and find in Excel where those numbers are 15 used, evarywhere they are used, and see how they're 16 working and what they are interacting with. There's 17 feature in Excel called -- and I'm not an Excel 18 expert -- it's called an "auditing" feature. 19 20 identifies every place that the value that's in Cell That's turned off in the Hatfield Model. 21 N30 is used. It may be for reasons of intellectual property 22 protection purposes -- and those may be legitimate. In 23 any case, it simply makes it much more difficult to 24 trace down things that you have questions about. 25

1 So the documentation that we have at this point is. is not adequate. The sensitivity testing and the 2 3 verification and the validation have really just begun. Now, in questions to Dr. Kelley there was some, there was some discussion about what kind of validation --5 that is, comparing the predictions. In an economic 6 7 model, the proof is in the predictions. So how good are 8 the predictions? 9 Well, you need to check what the model predicts, 10 not against embedded stuff but just recent or current 11 projects that have recently been finished - the 12 installation of a central office switch, the wiring of 13 a new development with 2 or 300 homes which approximates the size of a census block group. 14 And I think both the model builders and users have some 15 16 responsibilities in that regard. It's not all the responsibility of one party or the other. 17 18 There's one prediction, in particular, that I think some of us are going to be interested to see what the 19 outcome is -- and that relates to a prediction, that 20 relates to the Hatfield Model's discussion of the 21 22 appropriate methodology or treatment for what it calls 23 these variable support costs. What it says are incorrectly called overhead costs 24 because they seem to vary some with some measures of 25

| 1  | the size of the firm, and so the argument is that if    |
|----|---|
| 2  | instead of an integrated end-to-end local telephone     |
| 3  | company, it was broken up into 11 separate entities     |
| 4  | each producing an unbundled network element, okay, that |
| 5  | these variable support factors, or these overheads or   |
| 6  | these common costs would be smaller for each one of     |
| 7  | these firms and they use the example of the             |
| 8  | president's desk. Presumably, that applies to the       |
| 9  | president's salary and presumably it works as well for  |
| 10 | the chairman's desk and the chairman's salary.          |
| 11 | And we have a natural experience, experiment            |
| 12 | happening. AT&T is about to trivest itself. And I       |
| 13 | think saveral months down the road, we'll be able to    |
| 14 | see whether the chairman's salary has gone down         |
| 15 | substantially and whether his desk has gotten smaller.  |
| 16 | And that ends my presentation. Thank you.               |
| 17 | MR. McCORMICK: Thank you, Dr. Cole.                     |
| 18 |   |
| 19 | MICHAEL DOANE,  |
| 20 | being first duly sworn on oath, testified as follows:   |
| 21 |   |
| 22 | DIRECT L'AMINATION BY MR. McCORMICK:                    |
| 23 | MR. McCORMICK: Mr. Doane, you're still under oath.      |
| 24 | Why don't you go ahead with your presentation.          |
| 25 | A Thank you Good morning Mr Chairman.                   |

# APPENDIX E

| 1  | SAN FRANCISCO, CALIFORNIA, SEPTEMBER 18, 1996 - 8:47 AM  |
|----|--|
| 2  | * * * *  |
| 3  | ADMINISTRATIVE LAW JUDGE WEISSMAN: The Commission        |
| 4  | will be in order.  |
| 5  | This is the time and place for the first day             |
| 6  | of arbitration hearings in Application 96-08-041.        |
| 7  | There are several preliminary matters that we            |
| 8  | need to address.   |
| 9  | First of all, there were two pending motions             |
| 10 | that I have discussed with the principal parties in      |
| 11 | off-the-record discussions and wanted to memorialize     |
| 12 | today.   |
| 13 | The first was a motion by AT&T requesting that           |
| 14 | our discussion of costs and prices related to various    |
| 15 | services that would be part of the interconnection       |
| 16 | agreement be limited to discussion of the proxies        |
| 17 | offered in the FCC orders related to interconnection     |
| 18 | agreements to the extent to which proxies exist for      |
| 19 | those specific costs and prices.                         |
| 20 | And the implication of that ruling would be              |
| 21 | that we would not directly in these hearings address     |
| 22 | specific many of the specific cost studies offered by    |
| 23 | GTE in its response to the petition for arbitration.     |
| 24 | As I have indicated to the parties previously,           |
| 25 | I will grant that motion.                                |
| 26 | The FCC orders are clear in terms of the fact            |
| 27 | that in circumstances where the state has not already    |
| 28 | adopted cost studies that are directly applicable to the |

| 1  | AFTERNOON SESSION - 1:25 P.M.                           |
|----|---|
| 2  | * * * *   |
| 3  | ALJ WEISSMAN: We'll be in order.                        |
| 4  | We're going to hear additional testimony in             |
| 5  | Application 96-08-041.                                  |
| 6  | Dr. Mercer who is the witness we're going to            |
| 7  | hear today is currently still on in a proceeding next   |
| 8  | door.   |
| 9  | After we handle the one procedural matter,              |
| 10 | we'll break until Dr. Mercer is ready.                  |
| 11 | The procedural matter concerns the status of            |
| 12 | I believe five separate attachments.                    |
| 13 | I have five separate items that were part of            |
| 14 | the work papers attached to the cost studies.           |
| 15 | The most recent focus of our attention is a             |
| 16 | letter that Ms. Lusing wrote to Randy Goch at AT&T and  |
| 17 | faxed yesterday afternoon raising the fact that now     |
| 18 | that the cost studies are being examined more closely,  |
| 19 | and the issue of what to do with the vendor proprietary |
| 20 | cost studies comes back to the surface.                 |
| 21 | What I'd like to do in terms of trying to               |
| 22 | understand this problem a little better Judge Kotz      |
| 23 | also wants to have a dialogue among us about what these |
| 24 | studies are and the status of your efforts to get a     |
| 25 | national agreement with the vendors.                    |
| 26 | If you could possibly first start by trying             |
| 27 | to help us understand a little better what these are.   |
| 28 | Do they, in fact, reflect cost studies                  |

1 situation one could go about doing a test against 2 reality? 3 WITNESS DUNCAN: The test against reality may be a difficult one. 5 My own view is that the company's models are 6 typically based on real data and I admit that my 7 understanding is -- companies don't share these, don't put these out for other people to look at particularly 8 9 with oncoming competition. 10 I don't know the answer of how you would check his model. 11 My claim is that it hasn't been checked. The 12 13 fact that it's difficult to do so or that it can't be 14 done, doesn't mean that that makes it necessarily an 15 acceptable model. 16 That's why I looked at these other areas. 17 ALJ WEISSMAN: Let's break away from the 18 discussion specifically of the Hatfield Model. How would you, in a circumstances like this, 19 where you have to deal with whatever data you have 20 21 available, whether inside the company or outside the 22 company, develop a model and you using forward-looking 23 predictions about what costs are going to look like in 24 this particular industry with this particular set of 25 assumptions about future services, how do you do a reality check of a model like that? 26 27 WITNESS DUNCAN: What I would do, I would

probably do some sampling. I would probably do a

28

- 1 study, maybe a third party study -- I'm not saying this 2 is feasible. I'm saying how would I go about doing it. 3 I would get into what the firm is currently doing, look at what the firm is currently paying. 5 I do not believe that the firms are 6 inefficient in the sense in which they have been 7 characterized. 8 I actually think that the efficiencies are 9 not engineering efficiency. Any efficiencies are 10 pricing inefficiencies and that these will be rapidly fixed by the market. The inefficiencies aren't 11 12 engineering inefficiencies. 13 As a consequence, you look at what is 14 actually happening now on a going forward basis. My way of doing it, would be to estimate in 15 an econometric cost function based on input prices, 16 17 outputs, growth rates, blocking probabilities, grades 18 of service, whatever it is that needs to be in there 19 estimating an econometric model. And then go and ask
- service, fill factors -- How will those things change
  cost of capital when there is competition?"

the question, "How will the input prices change.

How will those price blocking probabilities, grades of

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I don't believe the structure of a well defined cost function is going to change.

If you estimated the cost function that represents the technology, then it's a matter of changing the inputs to match the inputs that you will

- see in the competitive market.
- To make it dynamic, it's a matter of doing a
- 3 little more present discounted value calculations,
- 4 taking into account the lives of equipment and into
- 5 account forecasts of demand.
- 6 I would hope -- I don't know this -- I would
- 7 hope there is sufficient data around for people to do
- 8 that. To go back a few years perhaps, build the model
- 9 based on a few years of data and forecast forward.
- 10 That would be the ideal.
- It's at least conceptually possible.
- 12 WITNESS MERCER: I'm not sure how much discourse
- is supposed to be. Can I just keep speaking to these
- 14 things?
- 15 ALJ WEISSMAN: I'll try to play traffic cop here.
- 16 You're on.
- 17 WITNESS MERCER: We just got a lot put on the
- 18 table. I thought you wanted me to go one area at a
- 19 time. You asked about reality.
- 20 ALJ WEISSMAN: Right.
- 21 WITNESS MERCER: You cannot use as a criteria
- 22 reality of what the future competitive situation will
- 23 look like because, if you look at GTE's network, it
- 24 would not reflect a competitive situation. It's not
- 25 competitive.
- 26 I want to get to this point about
- 27 competition, growth and so on later.
- 28 I want to stick right now to reality. And I

- 1 have another suggestion. The model will stand the
- 2 scrutiny of this, of how you check for reality today.
- 3 The way you check reality, you can look --
- 4 and you can look at and these cell -- these 5,000
- formulas or read the documentation.
- 6 You can see what kind of traffic engineering
- 7 we assumed. You can see how we plan capacity. You can
- 8 ask yourself, "Is that the way the exchange carrier
- 9 would do it?"
- Now, it's not true there has been no
- 11 comparison in real world studies.
- 12 There was earlier this year in a proceeding
- on the universal service. There were specific areas
- 14 studied.
- In those specific areas studied, the model
- 16 did some ups and some downs.
- 17 Here's the problem it disclosed about
- 18 reality. One point, Pacific Bell took a city which was
- 19 Angels Camp -- as I understand is a 300 household town
- 20 up in the hills -- and we looked at a specific feeder
- 21 route. The Hatfield Model looked at compared to what
- 22 we had done.
- 23 When we did that, we found the Hatfield Model
- 24 grossly underestimated the feeder plan. We went to
- 25 look and see what happened.
- 26 Here is what happened. We're talking about
- 27 serving a fraction of a 300 household town. In our
- 28 model -- assuming fiber deployment to digital loop